Kootney Lake, Summary of Public Input

◄ TOC ►

Kootney Lake Timber Supply Area, Summary of Public Input

Kootenay Lake Timber Supply Area

Timber Supply Review

Summary of Public Input

B.C. Ministry of Forests
Kootenay Lake Forest District
R.R.#1, 1907 Ridgewood Road
Nelson, B.C. V1L 5P4

This is a summary of the public input that has been received on the Timber Supply Review in the Kootenay Lake Timber Supply Area. This summary does not assess the feasibility or validity of the input or whether it relates to the clearly defined mandate of the chief forester in the allowable annual cut determination.

◄ ▲ TOC ►

Kootney Lake Timber Supply Area
Summary of Public Input

106-05173/

B.C. Ministry of Forests

Kootney Lake, Summary of Public Input

- Kootney Lake Timber Supply Area, Summary of Public Input
- Background
- Public Review Process and Response
- Public Input
  - General input
  - Timber Supply Analysis Report
    - Timber industry critique
  - Public Discussion Paper
    - Critical factors that indicate a reduction in the short-term timber supply from the base case
    - Possible opportunities to partially offset reductions in short-term wood supply
  - Socio-Economic Assessment
    - Impacts on the local timber industry
    - Employment and economic impacts
    - Community impacts
    - Environmental concerns
    - Impacts of other government initiatives
- Appendix A
  - Responses received from organizations

Kootney Lake, Summary of Public Input

◄ TOC ►

Background

As part of the review of timber supply in the Kootenay Lake Timber Supply Area, the British Columbia Forest Service distributed a *Public Discussion Paper* and two technical reports. The public was encouraged to review and comment on the accuracy of the information in these documents and to provide additional information where appropriate. This report summarizes the input received during the 90-day review period. This information was provided to the chief forester for his consideration when he determined the allowable annual cut for the Kootenay Lake Timber Supply Area.

The first section of this summary outlines the public review process implemented by the Forest Service, and describes the types of public input received. The second section summarizes the public input in sufficient detail to indicate the range of input received. The original submissions (with personal identifiers removed in accordance with the *Freedom of Information and Protection of Privacy Act*) can be reviewed at the Kootenay Lake Forest District office.

◄ ▲ TOC ►

Kootney Lake, Summary of Public Input

◄ TOC ►

Public Review Process and Response

Assessment of the timber supply in the Kootenay Lake Timber Supply Area has been underway since 1987. During this time, a great deal of interest was expressed by media, local governments, forest companies, groups, and individuals. Over the years, Forest Service staff provided many presentations to update interested parties on the process.

As part of the Timber Supply Review initiated in 1993, Kootenay Lake Forest District staff actively solicited public input through the following actions:

- When the *Kootenay Lake Timber Supply Analysis Report* was completed in July 1993, 68 forest-related companies, groups and government agencies in the Kootenay Lake Timber Supply Area were advised of its availability. The general public were made aware through a press release and advertising in local papers. Approximately 350 copies of the report were distributed to interested groups and individuals. Presentations were made to local governments, forest companies, Forest Service staff, and other organizations at this time.

- When the *Kootenay Lake Socio-Economic Assessment* and *Public Discussion Paper* were completed on July 20, 1994, the *Discussion Paper* was circulated to the same groups which received the *Timber Supply Analysis Report* and they were advised that the *Socio-Economic Assessment* was available. The *Public Discussion Paper* included a response form which readers were encouraged to complete and return to the Forest Service District Manager.

- Copies of the three documents were available at the four Forest Service offices within the Kootenay Lake District (Nelson, Four-Mile, Creston and Kaslo). Approximately 830 copies of the *Discussion Paper* and 150 copies of the *Socio-Economic Assessment* were circulated.

- Forest Service staff offered to make presentations or discuss the Timber Supply Review in detail with each of the 68 organizations and groups within the timber supply area. Presentations were made to four local governments and one community round table.

- Public open houses were held at Forest Service District offices in Creston, Kaslo and Four-Mile, near Nelson.

- Forest Service staff were interviewed by local newspapers and radio stations, who gave considerable publicity to the Timber Supply Review. On October 4th, 1994, the District Manager participated in a debate on this subject hosted and covered by the local cable television station.

As Table 1 shows, approximately 68 individuals attended the information sessions and open houses. The low attendance at the open houses appears to have been largely due to the many different government initiatives which were underway at the time, particularly the Kootenay-Boundary Regional Land Use Planning process of the Commission on Resources and Environment (CORE).

Organization (No. of participants) **Date**

Information Sessions

Nelson City Council (17)	September 12, 1994
Regional District of Central Kootenay Natural Resources Committee (11)	September 15, 1994
Kaslo and Area Round Table (13)	September 22, 1994
Creston Town Council (9)	September 26, 1994
Kaslo Village Council (9)	October 11, 1994
Open houses	
- Nelson (5)	October 4, 1994
- Creston (1)	October 5, 1994
- Kaslo (3)	October 6, 1994

Table 1. Participation at the information sessions and open houses

The Kootenay Lake Forest District and the chief forester received 172 written responses from individuals, municipal governments, and companies. (Appendix A lists the organizations which provided written responses.) Most respondents wrote letters or briefs; only 12 response forms from the *Public Discussion Paper* were completed

The Kootenay Lake Forestry Association, which includes the forest companies operating in the Kootenay Lake Timber Supply Area, conducted a separate timber supply analysis using different assumptions regarding timber supply (referred to as the 'timber industry critique' in this summary). The Interior Lumber Manufacturers' Association also provided a critique of the *Socio-Economic Assessment*.

The reports and written submissions have been summarized into this report.

◄ ▲ TOC ►

Kootney Lake, Summary of Public Input

Public Input

In this section, public input on the information presented in the three Timber Supply Review documents for the Kootenay Lake Timber Supply Area is summarized under the following headings:

- general input
- timber supply analysis report
- socio-economic assessment
- public discussion paper

Public input on other ongoing government processes which may influence future timber supply in the Kootenay Lake Timber Supply Area is summarized at the end of this section.

Kootney Lake, Summary of Public Input

◄ TOC ►

General input

The written responses received by the Forest Service can be categorized as follows:

- 60 were signed form letters, primarily from individuals between 9 and 18 years of age. The form letter questioned the methodology of the Forest Service analysis and emphasized the importance of timber harvesting to the Kaslo area.

- 74 responses were from groups or individuals who supported a minimum reduction, if any, to the allowable annual cut, due largely to the importance of timber harvesting to their lifestyles and to the local economy.

- 37 responses suggested protection of the environment, biodiversity, and other non-timber forest resources required greater restrictions on timber harvesting, and requested a more drastic reduction to the allowable annual cut than indicated by the base case timber supply forecast in the Forest Service analysis.

- 4 responses were neutral. One indicated the methodology and timeframes for the Timber Supply Review were unrealistic and suggested they be re-evaluated. Another stressed the importance of co-use of forest resources and of local reinvestment of forest revenues. A third acknowledged the difficult task facing the chief forester and requested that a careful and balanced decision be made. The fourth criticized the assessment of the agricultural sector in the *Socio-Economic Assessment*.

◄ ▲ TOC ►

Kootney Lake, Summary of Public Input

Timber Supply Analysis Report

Kootney Lake, Summary of Public Input

◄ TOC ►

Timber industry critique

The critique of the Forest Service timber supply analysis completed for the Kootenay Lake Forestry Association differed from the Forest Service analysis because:

- new managed stand yield tables were used which forecast more rapid growth for new forests that are established by reforestation after harvesting compared to historical growth rates of naturally established forests

- some of the forested land that was not included in the timber harvesting land base was included in the evaluation of the impacts of the forest cover requirements which restrict timber harvesting to maintain defined forest conditions for non-timber resources

These differences resulted in an increased forecast of timber supply compared to the Forest Service analysis. The base case forecast in the Forest Service analysis indicated an initial harvest level of 803,000 cubic meters per year for 10 years, followed by a decline over 60 years to a long-term timber supply level of 490,000 cubic meters per year. The timber industry critique indicated a starting harvest level of 810,000 cubic metres per year was possible for 10 years, followed by a decline over 60 years to a long-term timber supply level of 656,000 cubic metres per year.

The Kootenay Lake Forestry Association presented the results of their analysis to forest workers and local governments in the area, many of whom made reference to this analysis in their submissions. Fifty respondents suggested the Forest Service analysis was out of date, 17 questioned why the analysis for the Kootenay Lake Timber Supply area had used a different approach than analyses being completed by the Forest Service for other parts of British Columbia; 16 stated they supported the Kootenay Lake Forestry Association analysis. Of these respondents, 39 felt if there was to be an allowable annual cut reduction, it should be less than 10 per cent in the first decade; 43 felt that any reductions should be absorbed by the Forest Service Reserve, the portion of the allowable annual cut that is not allocated for harvesting except in emergency situations such as for pest control or to salvage timber burned in wildfires. In the Kootenay Lake Timber Supply Area, 15.4 per cent of the allowable annual cut (138,820 cubic metres per year) is currently allocated to the Forest Service Reserve.

However, other respondents indicated the Forest Service base case forecast is too optimistic. Thirty-six respondents indicated harvest restrictions to accommodate old growth forests, wildlife, biodiversity, visual quality, sensitive soils, and other values were not adequately accounted for in the Forest Service analysis. Concern was also expressed about the timber supply impacts of poor survival and growth of planted trees and the impacts of diseases such as root rot. Many felt our present knowledge was insufficient to effectively manage forest ecosystems, that accurate prediction of the future was not possible, and that harvest rates should be conservative in light of this uncertainty. One respondent suggested the Forest Service Reserve should be used to offset the impacts of expected new wilderness areas.

Although perspectives regarding the immediate situation differed, several common themes emerged. Most recognized that a reduction in the allowable annual cut was necessary. As well, both forest workers and environmentalists repeatedly stressed the importance of quality of life, their love for the area, and their desire to continue to live here.

Some respondents pointed out that the historical harvest rate has been about two-thirds of the present allowable annual cut, which suggested to them that the current allowable annual cut is too high.

TOC

Kootney Lake, Summary of Public Input

◄ TOC ►

Public Discussion Paper

Most of the respondents did not structure their comments specifically around the critical factors outlined in the *Public Discussion Paper*. However, the following comments regarding the critical factors were extracted from the responses.

◄ ▲ TOC ►

Kootney Lake, Summary of Public Input

◄ TOC ►

Critical factors that indicate a reduction in the short-term timber supply from the base case

- **uncertainty regarding the volume and availability of the existing merchantable timber**

Several respondents pointed out that the timber volumes which the Forest Service analysis projects to be harvested from each hectare in the first 20 years are considerably higher than the volumes that are actually being harvested. In their view, this is an important consideration because the timber supply forecast is extremely sensitive to these estimates. Four respondents suggested this factor supports the case for a significantly lower allowable annual cut. This factor was not addressed in the timber industry critique or in the submissions advocating a minimal allowable annual cut reduction.

- **uncertainty regarding forest cover requirements to meet integrated resource management guidelines**

In the timber industry critique, some of the forested land within the timber supply area that was not included in the timber harvesting land base in the Forest Service analysis was considered in the evaluation of the impacts of the forest cover requirements. These requirements restrict timber harvesting to maintain defined forest conditions for non-timber resources. In the Forest Service analysis, only the area within the timber management land base was included in the assessment of the impacts of the forest cover requirements. The Kootenay Lake Forestry Association and several other respondents felt the approach in the timber industry critique was more accurate.

Conversely, 19 respondents indicated the requirements for old-growth forests, biodiversity, caribou, grizzly bears, visual quality and other values were not adequately accounted for and the impacts of the forest cover requirements had been underestimated in the Forest Service analysis.

- **effects of a four- or five-pass harvesting system**

Two respondents indicated the move to additional harvest passes would reduce the availability of timber.

- **planning delays**

A number of respondents touched on this issue. Several indicated land-use and resource conflicts were likely to increase in the future, exacerbating the existing planning delays and associated timber supply shortages. Others suggested the current planning delays were unnecessary and were a major reason why the actual harvest level had remained well below the allowable annual cut.

◄ ▲ TOC ►

Kootney Lake, Summary of Public Input

◄ TOC ►

Possible opportunities to partially offset reductions in short-term wood supply

- **increasing the timber management land base**

The Forest Service analysis is based on the area within the Kootenay Lake Timber Supply Area that is feasible and economical to harvest and reforest—the timber management land base. The land base used in the timber industry critique was slightly larger than was used in the Forest Service analysis. However, this had little effect on the timber supply forecast in the timber industry critique.

- **reducing the minimum harvest ages**

Three respondents indicated concern that the minimum harvest ages are too young.

- **reduction of losses to wildfire, insects, disease and blow down**

Four respondents indicated insect and disease losses were likely to increase in the future. This was not addressed in the timber industry critique.

- **increasing the growth rate of regenerated forests**

Six respondents indicated silvicultural successes would at least partially offset the decline in timber supply. As mentioned, the timber industry critique used managed stand yield tables which projected faster growth for reforested areas. This did not affect the forecast short-term timber supply, but it did increase the projected long-term timber supply.

A number of respondents expressed doubt that regenerated forests would perform as well as expected, citing personal knowledge of plantation failures, climatic change, and a lack of human knowledge of how forest ecosystems function.

◄ ▲ TOC ►

Kootney Lake, Summary of Public Input

Socio-Economic Assessment

Kootney Lake, Summary of Public Input

◄ TOC ►

Impacts on the local timber industry

The Kootenay Lake Forestry Association questioned statements in the *Socio-Economic Assessment* and the *Public Discussion Paper* indicating the impacts of an allowable annual cut reduction may be less severe than in other areas because historical harvest levels have been considerably lower than the allowable annual cut. The Association indicated that public sources of timber will become increasingly important in the future as alternative supplies, primarily from private land, diminish.

◄ ▲ TOC ►

Kootney Lake, Summary of Public Input

◄ TOC ►

Employment and economic impacts

It is assumed in the *Socio-Economic Assessment* that harvest reductions will lead to proportionate losses in jobs and forest revenue. A number of respondents pointed out that value-added manufacture has the potential to change this relationship. However, forest companies pointed out that reductions below a critical threshold could result in mill closures and job losses which are far greater than would be expected under a proportional relationship.

The Interior Lumber Manufacturers' Association submitted a critique of the *Socio-Economic Assessment* including a number of criticisms, with particular emphasis on the following:

- direct forestry employment within the timber supply area appears to be understated by 18.5 per cent
- direct provincial forestry employment appears to be understated by 12.5 per cent
- provincial indirect employment generated by the spending of forest workers and forest companies appears to be understated by approximately 19 per cent
- total provincial employment generated by the current harvest appears to be understated by 12 per cent
- income (earnings) generated by forest industry activity appears to be understated by 12.5 per cent
- total earnings (direct and indirect) within the province related to the current harvest level appears to be understated by 12.5 per cent
- lost government revenue is significantly understated
- the ability of tourism to offset forest job losses is overstated

Two respondents suggested a 'biological allowable annual cut' should be calculated for the timber supply area showing the impact of the lost harvesting opportunity that is created by integrated resource management.

The Creston Valley Agriculture Society criticized the *Socio-Economic Assessment,* suggesting a thorough evaluation of the agricultural industry was not done.

◄ ▲ TOC ►

Kootney Lake, Summary of Public Input

◄ TOC ►

Community impacts

Most of the respondents expressed strong concern about impacts on local communities if forestry employment declined significantly due to an allowable annual cut reduction. It was suggested that any reduction be taken first from the Forest Service Reserve, and not from the timber allocated to forest companies. One respondent suggested the timber allocated to the recently cancelled forest licence for Kootenay Valley Sawmills could also be used. Another respondent suggested that mills which had upgraded to maximize recovery and minimize waste should be the last to receive allowable annual cut reductions. The City of Cranbrook and the Town of Creston advocated an allowable annual cut reduction of no more than 10 per cent, with this reduction to be taken from the Forest Service Reserve.

A number of respondents expressed concern about the community impacts of excessive harvesting. Future timber supply reductions, degradation of visual quality, loss of biodiversity, and impacts on other values are seen as consequences if the new allowable annual cut is set too high. One respondent suggested the necessary reductions should be gradual but they should start immediately, that a significant Forest Service Reserve should remain to provide flexibility, and communities would benefit from moving to a more diverse economy. The City of Nelson advocated an allowable annual cut of 544,000 cubic metres per year, consistent with Scenario III in the *Socio-Economic Assessment*.

There is a wide range of opinion concerning the ability of communities within the timber supply area to adapt to a reduction in the allowable annual cut. Some pointed out Nelson's successful resolution of the local economic problems caused by a major mill closure in the past. Others were not optimistic about the ability of their communities to absorb additional change.

◄ ▲ TOC ►

Kootney Lake, Summary of Public Input

◄ TOC ►

Environmental concerns

Much of the input indicated a strong perception that current forest management practices do not adequately address integrated resource management or the requirements for biodiversity. It was pointed out that riparian areas adjacent to streams or waterbodies were not specifically removed from the timber management land base in the Forest Service analysis. The old-growth requirements were also considered inadequate by many.

The loss of productive forest land to roads was also a concern to several respondents. One person indicated further mapping of sensitive soils would reveal the timber management land base was considerably smaller than estimated.

A number of respondents questioned the credibility of the Forest Service, government, and large forest companies in ensuring environmental impacts are fully accounted for in the Timber Supply Review.

Many of the respondents recommended a significant reduction in the allowable annual cut, in light of limited knowledge about forest ecosystems and uncertainty about the future. Of those respondents who advocated a significant reduction to the allowable annual cut, nine made specific proposals, varying from 362,000 cubic metres per year to 604,000 cubic metres per year, but they did not provide analytical rationales.

◄ ▲ TOC ►

Kootney Lake, Summary of Public Input

Impacts of other government initiatives

It was repeatedly stated, verbally and in writing, that evaluating timber supply is difficult while other government initiatives are underway such as the Forest Practices Code, the Commission on Resources and Environment (CORE), and the Protected Areas Strategy. There was unanimous agreement among the respondents that these initiatives should be completed and followed by a reassessment of the timber supply.

Several respondents suggested that reform of the tenure system was needed to encourage small-scale stewardship to ensure environmentally sound forest management. Others advocated the establishment of more protected areas to achieve this goal.

Kootney Lake, Summary of Public Input

Appendix A

Kootney Lake, Summary of Public Input

Responses received from organizations

Local government
City of Nelson
City of Cranbrook
Town of Creston

Industry
Meadow Creek Cedar Limited
Crestbrook Forest Industries Limited
Lost Creek Logging Limited
Wynndel Box & Lumber Company Limited

Timber company organizations
Kootenay Lake Forestry Association
Interior Lumber Manufacturers' Association

Consulting firms
Timberland Consultants Limited

Other organizations
Outdoor recreation non-motorized sector (from the West Kootenay-Boundary CORE process)